

Thank you for the opportunity to comment on the Hanford Remedial Action Environmental Impact Statement and Comprehensive Land use Plan (HRA-EIS). We are pleased the U. S. Department of Energy (USDOE) has recognized the irreplaceable ecological values of the Wahluke Slope and the Hanford Reach of the Columbia River in their preferred alternative within the HRA-EIS. In general, we support the USDOE's preferred alternative, however our support is subject to the following necessary modifications:

- * Designate all lands within the Arid Lands Ecology Reserve, Wahluke Slope, Columbia River islands, Riverlands, and McGee Ranch a national wildlife refuge. The Columbia River and an area 1/4 mile from either shore should be designated a Recreational Wild and Scenic river. All these areas should be managed by the U.S. Fish and Wildlife Service.
- * Issue a separate Record of Decision without delay for the areas listed in the bullet above.
- * Replace all Industrial use areas in the preferred alternative with the combined Industrial use areas reflected in the recommendations from alternatives one and two.
- * Restrict designated recreational areas to one high intensity use area, i.e., museum at B Reactor; and one low intensity area, i.e., boat launch at the Vernita Rest Stop on the south side of the river.
- * Designate all other areas Conservation/Mining (without grazing) and limit mining to those areas necessary for mineral materials in support of Hanford cleanup.
- * Eliminate the possibility of agriculture, including grazing, on Hanford lands.

We look forward to the final HRA-EIS and will continue to support preservation of the unique natural legacy found on the Hanford Site and the Hanford Reach of the Columbia River while providing for reasonable economic development of Hanford lands.

Sincerely,

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Bullet one: Under contract to the USDOE, the Nature Conservancy has conducted a biological survey of Hanford finding over twenty rare species of plants and insects some of them new to science. The McGee ranch provides an invaluable wildlife connection to the Umpthanum Ridge and on to the Cascade range. U.S. Geological Survey, Bureau of Reclamation and Washington State University studies have shown that farming the Wahluke Slope would jeopardize the White Bluffs, which border the Hanford Reach, by causing landslides into salmon spawning sites.

Bullet two: The ALE and Wahluke Slope are already managed as wildlife refuges while the McGee Ranch makes the connection between the two providing a contiguous wildlife refuge in one of the last, large tracts of shrub-steppe habitat in Washington State. Wildlife Refuge designation for the Wahluke Slope and Wild & Scenic River designation for the Hanford Reach has been recommended in the Hanford Reach Final EIS, June, 1994 and its associated Record of Decision.

Bullet three: The industrial-exclusive areas (200 Areas) should reflect alternative one and two boundaries (western extension of preferred alternative is not necessary for Hanford Operations). The combined Industrial areas described in alternative one and two provide over 6,200 acres of public land for industrial expansion in addition to the 11,350 acres for Industrial-Exclusive use of the 200 Areas. This Industrial use designation includes all areas defined by the City of Richland in their Comprehensive Plan and provides more than ample space for local economic development, especially considering the acreage available off the Hanford Site currently planned for development. Industrial use should be restricted to locations contiguous with currently developed areas in the southeast portion of the Hanford Site where utilities are available and land disturbance is greatest. No industrial use should occur in sensitive wildlife habitats or further fragment these habitats.

Bullet four: Developed recreational areas should be restricted to one low intensity recreation area at the Vernita Rest Stop (an improved boat ramp in conjunction with the existing rest stop thereby reducing riparian area disturbance and utilizing existing developed resources, i.e. the facilities at Vernita). High intensity recreation must only occur at the B-Reactor which should be a museum. Access to B-Reactor must be by existing roads only (avoiding disturbance to important riparian habitat along the river). We encourage reasonable recreational use of the Hanford Reach and surrounding public lands, but recognize that developed recreation has similar environmental impacts as industrialized use of an area. No commercial development should be allowed in these low-intensity recreation areas.

Bullet five: Designating much of central Hanford lands as Conservation/Mining without grazing should occur only where immediate preservation as wildlife refuge is not feasible. The Washington State Department of Fish & Wildlife has identified substantial portions of central Hanford as priority habitat. The object of Conservation/Mining is to provide the USDOE mineral resources to complete cleanup activities while protecting valuable wildlife habitat. Therefore, mining must be restricted to only those activities supporting Hanford's cleanup mission and any areas not needed for mineral resources should be designated preservation. Grazing, or any agriculture, cannot be allowed on any Hanford lands since grazing increases fire danger and spreads noxious weeds. Agricultural use of Hanford lands would put Washington State agricultural products at risk of extremely negative publicity (mad cow disease is nothing compared to the stigma of beef or crops raised on Hanford, North America's most radioactive and hazardous waste site). Areas designated Conservation/Mining should revert to Preservation when those lands are no longer needed for Hanford clean-up.

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